

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:24-cv-00710-LCB-JLW**

**UNITED STATES OF AMERICA; STATE
OF NORTH CAROLINA; STATE OF
CALIFORNIA; STATE OF COLORADO;
STATE OF CONNECTICUT; STATE OF
MINNESOTA; STATE OF OREGON;
STATE OF TENNESSEE; and STATE OF
WASHINGTON,**

Plaintiffs,

v.

REALPAGE, INC.,

Defendant.

**DECLARATION OF AMY DREYFUSS IN SUPPORT OF DEFENDANT
REALPAGE, INC.'S MOTION TO TRANSFER UNDER 28 U.S.C § 1404(a)**

I, Amy Dreyfuss, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Senior Vice President, General Manager - Data and Analytics, at RealPage, Inc. (“RealPage”), the Defendant in the above-captioned case. I have worked for RealPage since June 2009, and am based in the company’s corporate offices in Richardson, Texas.

2. I respectfully submit this declaration in support of Defendant RealPage, Inc.'s Motion to Transfer Under 28 U.S.C. § 1404(a). This declaration is based on my personal knowledge and investigation. If called as a witness in this matter, I could and would testify competently to all of the information contained in this Declaration.

3. Since its founding in 1998, RealPage's corporate headquarters have been located in the Eastern and Northern Districts of Texas, and RealPage's corporate headquarters has been in the Northern District of Texas in Richardson, Texas, since 2016. Only 12 of RealPage's 3,298 U.S. employees work remotely from a residence in the Middle District of North Carolina.

4. RealPage provides software products to the real estate industry. In 2005, RealPage introduced its YieldStar revenue management software. This software has been used for nearly two decades and is in substantially the same form. In 2020, RealPage launched AI Revenue Management ("AIRM"), which is built from YieldStar, as a successor product to YieldStar. The software code base for both YieldStar and AIRM was developed and is maintained at RealPage's headquarters in Richardson, Texas, not in the Middle District of North Carolina.

5. It would be inconvenient and disruptive to RealPage's business for RealPage's employees to be subject to depositions and to appear at trial in the Middle District of North Carolina.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of September, 2024, in Richardson, Texas.

Signed by:

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Amy Dreyfuss